

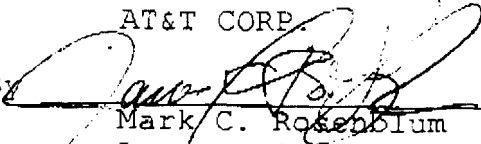
category 5 in Appendix C, "Time to Restore and Trouble Duration," should also include a "POTS" category, in order to capture information concerning trouble incidents for that service.

CONCLUSION

AT&T's proposed format for disclosure concerning exchange access and telephone exchange service is only five pages long, and would represent a minimal administrative burden on the BOCs. In light of § 272(e)(1)'s clear and unequivocal nondiscrimination requirement, and the Commission's finding that the information necessary to detect violations of this section will not be available absent data disclosure requirements, this minimal burden is entirely justified.

For the reasons stated above, the Commission's proposed § 272(e)(1) reporting requirements should be modified and adopted as set forth above.

Respectfully submitted,

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EXHIBIT 1

BOC Provisioning of Exchange Access Services

Service Category	Type of Access	Outcome for BOC	Outcome for BOC Affiliate
1) Successful completion according to customer-desired due date (measured as a percentage)	DS3 and Above		
	DS1		
	DSO		
2) Time from customer-desired due date to circuit being placed in service (% installed within each successive 24 hour period, until 95% installation)	DS3 and Above		
	DS1		
	DSO		
3) Time to firm order confirmation (% received within each successive 24 hour period, until 95% completed)	DS3 and Above		
	DS1		
	DSO		
4) Time from PIC change request to implementation (% implemented within each successive 6 hour period, until 95% implementation)	By CIC (10XXX) code		
5) Time to restore and trouble duration (% restored within each successive 1 hour interval, until resolution of 95% of incidents)	DS3 and Above		
	DS1		
	DSO		
	POTS		
6) Time to restore PIC after trouble incident (% restored within each successive 1 hour interval, until resolution of 95% of incidents)	By CIC (10XXX) code		
7) Mean time to clear network/average duration of trouble (hours)	DS3 and Above		
	DS1		
	DSO		
8) Jeopardy notification provided (notifications received more than 24 hours before scheduled deadline divided by total orders for which deadline missed}	DS3 and Above		
	DS1		
	DSO		
9) Incidence of new circuit failures (% failed within 30 days of installation)	DS3 and Above		
	DS1		
	DSO		
10) Failure frequency (% of circuits purchased by carrier that have experienced a trouble occurrence within calendar month)	DS3 and Above		
	DS1		
	DSO		
11) Network repeat failure within 30 days of initial trouble (% of circuits experiencing repeat failures within 30 days of a prior trouble report)	DS3 and Above		
	DS1		
	DSO		

EXHIBIT 2

BOC Provisioning of Telephone Exchange Services

Service Category	Type of Service or Facility	Outcome for BOC	Outcome for BOC Affiliate
1A) Time from request to time service/element is operable -- no premises visit or software-only changes (% received within each successive 24 hour period, until 95% completed)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
1B) Time from request to time service/element is operable -- premise visit required or other than software-only changes (% received within each successive 24 hour period, until 95% completed)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
2) Successful completion according to customer-desired due date (measured as a percentage)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
	Physical Collocation		
	Virtual Collocation		

Service Category	Type of Service or Facility	Outcome for BOC	Outcome for BOC Affiliate
3) Time to firm order confirmation (% received within each successive 1 hour period, until 95% completed)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNES		
	Physical Collocation		
	Virtual Collocation		
4) Mean time to clear network/average duration of trouble (hours)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNES		
5A) Response intervals for successful pre-order queries (% received within each successive 1 second period, until 95% completed)	Telephone Number Reservation		
	Due Date Reservation		
	Feature Function Availability		
	Facility Availability		
	Street Address Validation		
	Service Availability Information		
	Appointment Scheduling		
5B) Response intervals for successful pre-order inquiries (% received within each successive 5 minute period, until 95% completed)	Customer Service Records (CSR)		
5C) Percentage of time interface is available during business hours (total hours interface is actually available 8:00 a.m. through 6:00 p.m., Monday through Friday, divided by 50)	Pre-Order Inquiries Interface		
	Ordering Interface		
	Maintenance Interface		

Service Category	Type of Service or Facility	Outcome for BOC	Outcome for BOC Affiliate
6) Time from recording to successful delivery of exchange message record (EMR) records (% completed within each 24 hour period, until 95% delivered)	Resold Local Exchange Services		
	Unbundled Switch (with or w/o other UNEs)		
7) Time to restore and trouble duration (% restored within each successive 1 hour interval, until resolution of 95% of incidents)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
8) Network repeat failure within 30 days of initial trouble (% of services/elements experiencing repeat failures within 30 days of a prior trouble report)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
9) Jeopardy notification provided (notifications received more than 24 hours before scheduled deadline divided by total orders for which deadline missed)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		

Service Category	Type of Service or Facility	Outcome for BOC	Outcome for BOC Affiliate
10) Incidence of new service/element failures (% failed within 30 days of installation)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
11) Failure frequency (% of services/elements purchased by carrier that have experienced a trouble occurrence within calendar month)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
12) Completion notifications returned (% of completion notices delivered within each successive 24 hour period following completion, until 95% notifications)	Resold POTS		
	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		